

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

DOUGLAS and PAMELA PETERSEN,
Individually and as Administrator of the
ESTATE OF BRIAN PETERSEN,

Plaintiffs,

V.

MONTGOMERY COUNTY, TEXAS; et al.

Defendants.

~~~~~

C.A. NO. 4:20-4243  
JURY TRIAL DEMANDED

**DECLARATION OF DEFENDANT DETECTIVE DARRICK DUNN**

1. My name is Darrick Terrail Dunn, a defendant in the above cause. I have personal knowledge of all of the facts stated in this Declaration, and all such facts are true and correct.
2. Attached to this Declaration as Exhibit 1 are true and correct copies of print-screen photographs of the conversation between Brian Petersen and myself that took place on July 31 and August 1, 2019, over the Grindr app. These print-screen photographs were made by myself at or near the time of the conversation and were made from the phone issued to me by Montgomery County for the purposes of undercover investigation work, the same device that was used during the attached conversation.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on AUGUST 26, 2021

Darrick Terrail Dunn

## EXHIBIT 1



Yesterday

How's your week going?

6:48 PM

Are you looking for something tonight?

7:24 PM

And yes, I can host.

7:37 PM

You into younger boys

8:24 PM

What?

8:27 PM

Age?

8:30 PM

Say something...

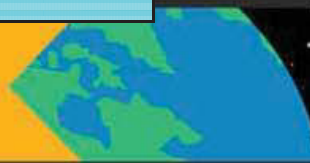


Aa



EXHIBIT 1

TO XTRA





Age?

8:30 PM

?

8:44 PM

You there?

8:52 PM

I'm here.. under 18

8:55 PM

There's a lot so wriggle room  
in that.

8:56 PM

Lol.. r u into younger boys

9:00 PM

Say something...



Aa



GIF



PRESS PLAY ALL DAY



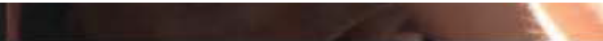


Lol.. r u into younger boys

9:00 PM

I'm into guys who are interesting.  
I'm not particularly into younger  
guys, but I don't write them off  
either.

9:01 PM



Say something...



Aa

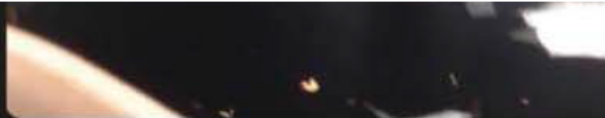


GIF



PRESS PLAY ALL DAY





9:07 PM

Lol How old though?

9:07 PM

Well I'm young just letting you know.. but I'm fun and cool

9:07 PM

How old?

You look fun and cool. I just need info to make a choice.

Say something...



Aa



GIF



PRESS PLAY ALL DAY





You look fun and cool. I just need info to make a choice.

9:14 PM

?

9:25 PM

I can host.

9:31 PM

U free tomorrow

9:50 PM

Maybe. It depends on if you give me information.

9:51 PM

What information

9:52 PM

Say something...



Aa



GIF



PRESS PLAY ALL DAY





What information

9:52 PM

First off, age.

Then maybe a few questions after that.

9:52 PM

I'm 14

9:53 PM

What school?

9:53 PM

Conroe high

9:53 PM

What activities do you do?

Say something...



Aa



GIF



PRESS PLAY ALL DAY





What activities do you do?

I have a lot of people I know there along with nephews your age that are involved in a lot.

9:59 PM

Well I'm knew to the school.. been there only 5 months.. I'm thinking about running track

10:05 PM

If we saw each other in public?

10:05 PM

What??

10:05 PM

Like if we ran into each other?

Say something...



Aa



GIF



PRESS PLAY ALL DAY





Like if we ran into each other?

How would you respond?

10:06 PM

Dunno.. I never seen you.. how would I know you.. about to go to be.. hit you tomorrow 💋

10:11 PM

Bed time?

10:14 PM

Today

Sorry I fell asleep last night.. GM

8:59 AM

Hey.

Say something...



Aa



GIF



PRESS PLAY ALL DAY







Hey.

9:42 AM

What experience do you have?

9:44 AM

I'm young but not dumb... 🤔 what you want??

9:57 AM

What sexual experience do you have?

9:57 AM

I been with 2 guys before if that's what yur asking

10:01 AM

Yeah. So you know how to take it?

Say something...



Aa



GIF



PRESS PLAY ALL DAY





Yeah. So you know how to take it?

When are you available and for how long?

10:02 AM

Of course... I'm free today from 1-10pm... my mom will be working

10:03 AM

Where would I pick you up?

10:04 AM

My apartment... where will we go??

10:04 AM

My house.

What's the complex name?

Say something...



Aa



GIF



PRESS PLAY ALL DAY







What's the complex name?

10:05 AM

The Park Apartments.. what time you tryna come??

10:06 AM

What time is best?

Google can't find The Park Apartments.

Did you just get dropped off somewhere? Your distance changed in like a second.

10:07 AM

I'm riding with my mom to the store.. 🤔 google the Park apartments Research Forest

Say something...



Aa



GIF



PRESS PLAY ALL DAY





I'm riding with my mom to the store.. 🤔 google the Park apartments Research Forest

2pm is good.. she will be gone

10:09 AM

You live there and go to CHS?

10:11 AM

Yeah we just moved there from Conroe. I told my mom I didn't want to change schools until next year.. then I'll go to Woodlands HS.

10:13 AM

That changes things. I have family right near you who go to Woodlands.

10:13 AM

Say something...



Aa



GIF



PRESS PLAY ALL DAY





That changes things. I have family right near you who go to Woodlands.

10:13 AM

Ok.. cool..

So you should know exactly where I'm at. 🧑

10:14 AM

Do people know you're gay?

10:16 AM

My mom does.. but she don't know I'm into older guys.. No one at my school knows

10:16 AM

And if we see each other in public, we pretend we don't know each

Say something...



Aa



GIF



PRESS PLAY ALL DAY

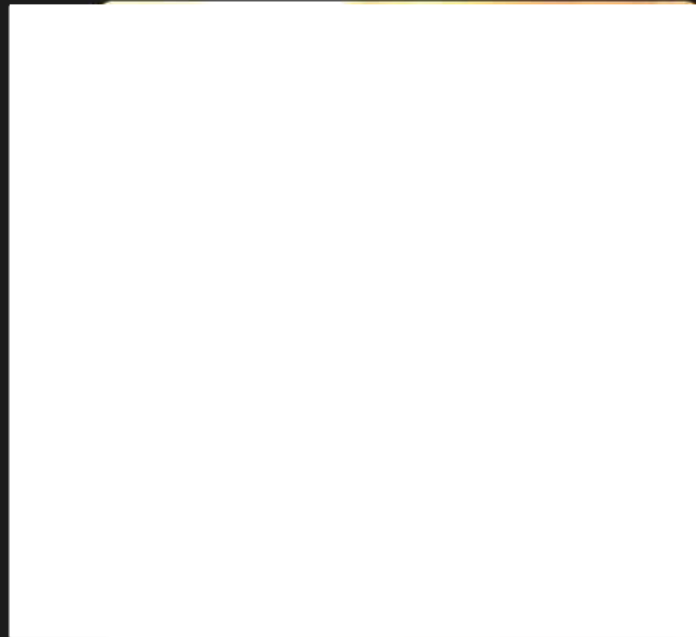




And if we see each other in public,  
we pretend we don't know each  
other.

Do you have a shirtless pic?  
No nudes.

10:18 AM



Cool.. I can play it off ... no shirtless  
pics ... I may let u take some 😊❤️

Say something...



Aa



GIF



PRESS PLAY ALL DAY







Cool.. I can play it off ... no shirtless pics ... I may let u take some 😊❤️

10:23 AM

Can you send me a picture

10:27 AM

I can't. The age differential makes sending a picture very risky.

10:28 AM

Ok cool.. i understand...r u currently married or dating??

10:29 AM

Not currently.

10:32 AM

Ok cool.. I don't have to worry

Say something...



Aa



GIF



IS PLAY ALL DAY



Ok cool.. I don't have to worry about drama..👍

10:33 AM

Nope. Drama isn't for me.

Where are you shopping?

10:34 AM

😊 .. I like that..... my mom like to come to this thrift store in Conroe.... I stayed in the car.. we will be leaving soon because she has to work

10:36 AM

So not back to school shopping.

Hey, can you send a voice message?

Say something...



Aa



GIF



PRESS PLAY ALL DAY





Hey, can you send a voice message?

10:39 AM

Not today... how do I send a voice message?

10:47 AM

It's the little mic where the send button is once you start typing.

10:51 AM

What u want me to say 🙋

10:57 AM

Up to you. Just tell me about yourself. Maybe a minute or so?

10:58 AM

Ok.. gotta wait a minute

Say something...



Aa



GIF



PRESS PLAY ALL DAY







Ok.. gotta wait a minute

11:06 AM

?

11:32 AM

My mom is right here...be patient daddy

11:40 AM

Sorry. I thought you were alone in the car.

11:54 AM

Any updates?

12:49 PM



0:13

Say something...



Aa



GIF



PRESS PLAY ALL DAY





0:13

Just sent it... about to head home

12:51 PM

R u there??

12:54 PM

Yeah. Sorry. I was answering a text.

12:54 PM

Ok no problem

So you get off at 5pm right??

12:55 PM

Lol Your voice was not what I was expecting.

Say something...



Aa



GIF



PRESS PLAY ALL DAY





Lol Your voice was not what I was expecting.

I thought we said 2pm.

You're alone now?

12:56 PM

Lol... what was you expecting?? My mom is about to leave in 5 minutes.. how far r u from me??

12:57 PM

About 20-30 minutes I think.

No idea what I was expecting.

Can you take that shirtless pic now?

12:59 PM

Say something...



Aa



GIF



PRESS PLAY ALL DAY





Can you take that shirtless pic now?

12:59 PM

You can head this way at 1:30

1:09 PM

You'll need to meet me out front.

1:10 PM

It looks like there's a strip mall right next to the complex. Can you meet me there?

1:13 PM

Yeah I can walk there.. what all do you wanna do today?

1:17 PM

We can decide that when we meet.

Say something...



Aa



GIF



PRESS PLAY ALL DAY





1:17 PM

We can decide that when we meet.

1:19 PM

Also, what's your name? Mine is Bryan.

1:21 PM

Jason... where r you trying to go Bryan.. I would just like to know what u r into so there's no surprises

1:21 PM

My house. Is that okay?

1:22 PM

It's cool .. I kinna wanted to stay at my house

1:24 PM

Say something...



Aa



GIF



PRESS PLAY ALL DAY







It's cool .. I kinna wanted to stay at my house

1:24 PM

I'm not tryna be in whips and chains..that's why I wanted to know what you were trying to do.

1:27 PM

?

No. Not anything like that.

1:28 PM

R u bottom or top?

1:30 PM

Top only.

1:30 PM

Say something...



Aa



GIF



PLAY ALL DAY



Top only.

1:30 PM

So what do you like?

1:31 PM

You there??

1:45 PM

I have been trying to message. The reception here is awful.

2:00 PM

Where r u??

2:01 PM

Head over to the entrance of sonic and I will meet you there.

2:01 PM

Say something...



Aa



GIF



LAY ALL DAY





Head over to the entrance of sonic and I will meet you there.

2:01 PM

I'm gonna call and tell my I will be going to a friends house... he's 14 like me and we go to the same school.

2:04 PM

Ok

2:09 PM

I'm nervous... a bit.. and besides I don't even know how you look. Yur very secretive

2:11 PM

I know. I understand if you want to not meet.

Say something...



Aa



GIF



PRESS PLAY ALL DAY





I know. I understand if you want to not meet.

But the circumstances require me to be less forthcoming.

2:12 PM

I generally only meet with guys 25+.

So this is new for me.

It's likely I'm about as nervous as you are.

2:14 PM

I understand what r saying.... just never been with a much older guy.... besides.. I usually know what to expect going into things like this.

Say something...



Aa



GIF



RESS PLAY ALL DAY



I understand what r saying.... just never been with a much older guy.... besides.. I usually know what to expect going into things like this.

2:15 PM

Same.

New territory for both of us. Should we decide not to?

2:15 PM

?

2:17 PM

We can always meet another time if you like.

2:18 PM

Say something...



Aa



GIF



PRESS PLAY ALL DAY





We can always meet another time if you like.

2:18 PM

I'm up for now or later. Later will be more difficult to arrange. I'm off today.

2:18 PM

We could meet now with the understanding that you won't be driving away with me.

2:20 PM

Let me know what you want.

2:23 PM

I can drive in circles much longer.

2:25 PM

Say something...



Aa



GIF



PRESS PLAY ALL DAY







I can drive in circles much longer.

2:25 PM

I'll assume it's called off.

2:30 PM

Ok...what time later

2:31 PM

Why not now?

What will be different later?

2:31 PM

Yeah yur right.... I haven't been with anyone in a while

2:35 PM

I assumed.

Say something...



Aa



GIF



PRESS PLAY ALL DAY



I assumed.

That's why I suggested we just talk,  
then decide, with my place not being  
an option.

2:36 PM

...?

2:38 PM

I've been circling for 40 minutes.  
Please make a decision.

2:41 PM

Ok... but you said you don't want to  
do my place

2:41 PM

I don't know.

Say something...



Aa



GIF



LAY ALL DAY



2:41 PM

I don't know.

Once I've spoken to you, maybe.

Please make a decision.

2:42 PM

Ok.. if I go wit you how long do you have and where is your place

2:43 PM

I said we won't go to my place.

You come to me. We talk for a bit. I drop you back off. Then we talk on here to see if we want to continue anything today.

2:44 PM

Say something...



Aa



GIF



PRESS PLAY ALL DAY







You come to me. We talk for a bit. I drop you back off. Then we talk on here to see if we want to continue anything today.

2:44 PM

I'm not trying to be mean, but if we haven't come to a decision by 2:50, I'm probably going to head home.

I understand your indecision and have been patient, but I do have other things I could be doing.

2:47 PM

Jason?

2:50 PM

Sorry... I'm just nervous and I think we should wait

Say something...



Aa



GIF



PRESS PLAY ALL DAY





2:50 PM

Sorry... I'm just nervous and I think we should wait

2:52 PM

I understand your reasons, and I respect the decision. But, I probably won't come back.

3:01 PM

I'm driving back by a moment.  
Last call.

3:06 PM

R u leaving??

3:10 PM

You said you didn't want to meet.

3:12 PM

Say something...



Aa



GIF



PRESS PLAY ALL DAY





You said you didn't want to meet.

3:12 PM

I have been sitting in my car driving aimlessly for over an hour. That's not counting the drive down. I don't just want to sit and do nothing. Fuck you Roy Heller you

That was weird.

Sorry I'm driving and I have no idea how he got that from what I would feed him feed the text.

I hate speech to text. It is useless

3:15 PM

What r u talking about??

Say something...



Aa



GIF



PRESS PLAY ALL DAY





What r u talking about??

I was gonna say we can just talk for a. But if you was still around

3:16 PM

I don't want to text and drive. I am using speech to text and it is not very good at recognizing what I'm saying. Did you put up random stuff.

You wanted to come outside??

3:17 PM

I will start driving back. When I get there I will be if you are at the entrance to sonic. If you're not I will just continue and drive back home.

3:18 PM

Say something...



Aa



GIF



. DAY





I will start driving back. When I get there I will be if you are at the entrance to sonic. If you're not I will just continue and drive back home.

3:18 PM

Ok.. .. well I just want you to know I said I been wit two guys but it was honestly only one last year when I was 13... I didn't want you to look down at me for being inexperienced. Hope yur not upset

3:23 PM

I am not upset. I don't care.

Are you there?

3:26 PM

I'm here wzup

Say something...



Aa



GIF



ALL DAY





I'm here wzup

3:26 PM

Are you at the entrance of sonic?

3:27 PM

Not yet

R u close by??

3:27 PM

Yes.

If I don't see you, I'm heading home.

3:29 PM

It's.. funny was asked earlier if I knew how to take it.... 🙄

Say something...



Aa




GIF



PRESS PLAY ALL DAY





It's.. funny was asked earlier if I knew how to take it.... 

It take time for me to walk there.. my apartment is at the back of the complex

3:30 PM

I will circle once.

3:32 PM

Are you close?

Or there?

3:35 PM

Starting my circle.

3:37 PM

Say something...



LAY ALL DAY



Starting my circle.

3:37 PM

Walking there now

3:40 PM

You are just now starting to walk?

3:40 PM

I'm out of the apartments

3:40 PM

Tell me when you're there and I'll start driving back

3:41 PM

Ok.. and what do I look for, a car.. truck.. van?? 🙄

3:42 PM

Say something...



Aa



GIF



PRESS PLAY ALL DAY





Ok.. and what do I look for, a car..  
truck.. van?? 🙄

3:42 PM

Almost there

3:44 PM

Where do I go

3:44 PM

Entrance to sonic

3:45 PM

Side entrance near the apartments

3:46 PM

Side entrance to what

3:47 PM

Say something...



Aa



GIF



IS PLAY ALL DAY



Side entrance to what

3:47 PM

Sonic

Sorry lots of traffic

3:47 PM

It's hot.. I'm gonna stand inside a restaurant and wait

3:48 PM

Outside next to the sign. I've been sitting in my car forever. You can stand outside for a couple minutes

Entrance sign

About to turn. Are you there?

Say something...



Aa



GIF



ESS PLAY ALL DAY





About to turn. Are you there?

3:50 PM

I'm at the first financial building  
across from sonic

Should I walk to sonic??

3:53 PM

Yes please.

3:53 PM

Ok which entrance?

3:54 PM

Side near the apartments

3:54 PM

Lots of cars here

Say something...



Aa



GIF



PRESS PLAY ALL DAY



3:54 PM

Lots of cars here

3:54 PM

Go out by where the cars enter and exits next to the street

3:55 PM

'This is too much.. what you driving??



Delivered 3:56 PM

Are you there?

3:56 PM

Yes

3:57 PM

Say something...



Aa



GIF



PRESS PLAY ALL DAY

